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WESTERN DISTRICT OF WASHINGTON AT TACOMA
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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHADINA DEVONA RICE,

Defendant.

NO. MJ10-5195

COMPLAINT FOR VIOLATION

Title 18, United States Code, Section 1591

BEFORE, United States Magistrate Judge, Richard Creatura, Tacoma, Washington.

COUNT 1

(Sex Trafficking)

During the time period beginning on or about July 1, 2010, and continuing through on or about September 30, 2010, at Tacoma, within the Western District of Washington, and elsewhere, SHADINA DEVONA RICE, did, in and affecting interstate commerce, knowingly recruit, entice, harbor, transport, provide and obtain by any means, a juvenile female, JV-1, with knowledge that JV-1 had not yet attained the age of 14 years old, and would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT 2

(Sex Trafficking)

During the time period beginning on or about July 1, 2010 and continuing through on or about September 30, 2010, at Tacoma, within the Western District of Washington,

and elsewhere, SHADINA DEVONA RICE, did, in and affecting interstate commerce, knowingly recruit, entice, harbor, transport, provide and obtain by any means, a juvenile female, JV-2 with knowledge that JV-2 not yet attained the age of 14 years old, and would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1). The undersigned complainant being duly sworn states:

- 1. I am a Police Officer with the Tacoma Police Department, and have been so employed since July 2005. I am also a Task Force Officer with the Federal Bureau of Investigation (FBI), and have been so employed since January 2010. I am currently assigned to the Tacoma Resident Agency of the Seattle Division as a member of the Innocence Lost Task Force. I have investigated numerous cases involving crimes against children, and I am familiar with the statutes pertaining to juvenile prostitution. I have attended various courses regarding the sexual exploitation of children, including a course regarding juvenile prostitution.
- 2. The information in this complaint is based upon my personal knowledge, from my review of Tacoma Police Incident report # 102520579.1, and information gained from witnesses and law enforcement officers with personal knowledge.
- 3. On or about September 6, 2010, Tacoma Police Officer Wishard responded to a complaint of a possible juvenile prostitution ring being operated out of or near the donut shop at E. 56th/ Portland Ave in Tacoma, Washington. The complainant, S.L., explained to Officer Wishard that she found her runaway daughter, JV-1, a thirteen year old, listed in a backpage.com advertisement. JV-1 was wearing very little clothing and was going by the name of "Nichole". The advertisement listed the phone number of 253-330-4023 and a list of prices. The complainant had her friend call the phone number and set up a "date". Officer Wishard went to the meeting location but JV-1 never showed up. Shortly thereafter, JV-1 returned home.

¹ Backpage.com is an internet site which has advertisements for prostitution.

- 4. On or about September 10, 2010, I met with S.L. and her daughter, JV-1. I first spoke with S.L. and learned that on or about August 31, 2010, JV-1 ran away from home. Thereafter, S.L.'s friend was searching on backpage.com to check up on her husband when she came across an advertisement with JV-1's photograph. S.L. stated that in the advertisement, JV-1 was posed in sexual positions and wearing little clothing. S.L. and her son began looking at more backpage.com advertisements and saw one of JV-1's teenage friend, JV-2. S.L.'s friend called the telephone number on JV-1's advertisement. An adult female answered. He set up a "date" and was told to go to Helen's donuts. He went to the location but no one showed up.
- 5. On or about Saturday, September 4, 2010, JV-1 called her cousin and asked her to pick her up at a convenience store on 44th and Portland Avenue, Tacoma, Washington. The cousin picked up JV-1 and brought her home. Over the course of the weekend, JV-1 disclosed to others that an adult female named "Shadina" had made her have sex with men for money. JV-1 also disclosed to a family member that "Shadina" threatened to hurt her if she did not pose for pictures and sleep with men for money.
- 6. After speaking with S.L., I interviewed JV-1. She told me that while she was a runaway, she met up with her runaway friend, thirteen year old, JV-2. JV-1 and JV-2 went to the defendant SHADINA RICE's house. RICE allowed both girls to live at her apartment. However, after a couple days, RICE told JV-1 that she would have to "work" to stay in the apartment. RICE told JV-1 that she was going to take pictures of her and put them on the internet. RICE further told JV-1 that she would then have sex with the men who responded to the ad in exchange for money. RICE told JV-1 that she would have to give her half of the money she made for "rent". JV-1 told RICE that she did not want to pose the pictures and did not want to sleep with men for money. RICE stated that if she didn't prostitute, she would have to leave.
 - 7. JV-1 stated that RICE took photographs of her and JV-2 with her

G1 T-mobile cellular phone and text messaged the photographs to Sabir Shabazz, who lives in Sea-Tac, Washington. RICE told JV-1 that SHABAZZ would upload the pictures onto the internet under backpage.com website.

- 8. According to JV-1, when the "johns" (a customer of prostitution) would call the 253-330-4023 phone number, RICE would answer, pretending to be JV-1. RICE would set up a "date" (a meeting between prostitute and "john" for sex in exchange for money) and tell the "john" to drive to the Helen's Donuts at E. 56th/ Portland Ave. When the "john" arrived there, RICE would tell them how to get to the apartment. When the "johns" arrived at the apartment, RICE would leave the apartment and go sit in her car in the apartment complex parking lot. The "john" would go inside the apartment, JV-1 would have sexual intercourse or oral sex with him in exchange for money. After the "john" left, RICE would return to the apartment and have JV-1 give her all of the money she earned.
- 9. JV-1 estimated that she had four (4) "johns" with whom she had sexual intercourse for \$100.00, sexual intercourse and girlfriend experience ("GFE") for \$160.00, and two oral sex for \$60.00. When asked what "girlfriend experience" meant, JV-1 stated it meant they had sex and "kissed and stuff."
- 10. JV-1 told me that JV-2 was most likely still living with RICE at her apartment. JV-1's mother also showed me a picture from a backpage.com advertisement which showed JV-2 posing on a counter. In the reflection of the mirror I saw a woman matching the description of RICE. JV-1 identified this person as RICE. Based on this information, it was my belief that RICE was engaged in promoting commercial sex abuse of a minor, and I initiated an investigation into RICE for promoting commercial sex abuse of a minor and sex trafficking.
- 11. On September 21, 2010, I obtained a signed search warrant from Pierce County Superior Court Commissioner Patrick Oishi to search both RICE's residence's and Sabir Shabazz's residence.

- 12. On September 23, 2010, myself and other officers served the search 1 warrants. As we approached RICE'S apartment at 1706 E. 56th #1, Tacoma, Washington, 2 I located RICE sitting in her car in the parking lot. I contacted her and placed her into 3 custody while the entry team made entry into the apartment. Inside the apartment we 4 located JV-2. She appeared scared and upset. She cried as she told me she wanted us to 5 help her get away from RICE. In the apartment we located several cell phones, a computer, condoms, fake identification cards of JV-2, paperwork for JV-2 to enroll in 7 school with RICE'S name as her guardian, and a blanket I recognized as being on the bed 8 in the photographs of JV-2 which were posted on backpage.com.
 - 13. We later searched the residence of Shabazz at 21822 30th Ave S #3, Des Moines, Washington where we located computers, cameras, flash drives, memory cards, condoms, and cell phones.
 - 14. Later on September 23, 2010, I interviewed JV-2. She told me that she ran away from home in late June 2010. After sleeping in school yards and on the streets for a couple of nights, her friend introduced her to RICE. RICE told her she could live in her apartment but she had to "work" to stay there. RICE told JV-2 she was a prostitute, and JV-2 would have to be one, too, if she wanted to stay. JV-2 told RICE she didn't want to do that, and RICE told her she had to leave if she didn't. Faced with being homeless again, JV-2 agreed. RICE took photographs of her with her cell phone and with her digital camera and JV-2 observed RICE post them onto the internet website, backpage.com, using her (RICE'S) cell phone number, 253-330-4023. When the "johns" would call, RICE would answer and pretend to be JV-2. RICE told JV-2 that she did this because she didn't want JV-2 "messing up a deal" by not saying the right thing. JV-2 said RICE would also tell "johns" that JV-2 would do sexual things that JV-2 didn't want to do, such as "girlfriend experience" and anal intercourse. Before the "john" arrived at the apartment, RICE would tell JV-2 how much the "john" was going to pay and for which sexual act. RICE would wait in her car outside or in the kitchen during the "dates".

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- 16. JV-2 told me she has told RICE on several occasions she didn't want to do this but that RICE would tell her she was going to continue. During one fight in particular about JV-2 quitting, JV-2 locked herself in the bedroom to get away from RICE, and RICE broke open the door and blocked the doorway when JV-2 tried to leave.
- 17. I submitted all the computers and cell phones to Tacoma Police Department Detectives Voce and J. Quilio to be processed for evidence. Detective Voce showed me several photographs he had found on the computers of JV-2 posed in several different sexual positions. The background in these photographs were in RICE'S apartment as well as possible hotel rooms. Detective Quilio told me she located several photographs on the cell phones of both JV-1 and JV-2 posed in different sexual positions.
- 18. Backpage.com responded to the state warrant I sent them with approximately 550 pages of information regarding the ads posted for JV-1, JV-2, and RICE herself. The ads showed that both RICE and SHABAZZ posted the ads on to the internet website. I also matched up several of the payment methods for the ads with credit cards I located in SHABAZZ'S wallet (which I obtained through search warrant). One of the credit cards was in RICE'S name and was located in SHABAZZ'S wallet. The other credit cards were pre-paid credit cards and found in SHABAZZ'S wallet.
- 19. Based upon the evidence obtained during the investigation, I believe there is probable cause to believe that SHADINA RICE was engaged in the sexual trafficking of JV-1 and JV-2 in violation of Title 18, United States Code, Sections 1591(a)(1) and

COMPLAINT/RICE-6

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3	ASHI EN A METTGER Complainant
4	ASHLEY A. METZGER, Complainant POLICE OFFICER/ TASK FORCE OFFICER FEDERAL DUREALL OF INVESTIGATION
5	FEDERAL BUREAU OF INVESTIGATION
6	Based on the Complaint and Affidavit sworn to before me, and subscribed in my
7	presence, the Court hereby finds that there is probable cause to believe the defendant
8	committed the offense set forth in the Complaint.
9	Dated this 1974 day of November, 2010.
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12	RICHARD CREATURA
13	United States Magistrate Judge
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